

Promoting Proper Forest Practices

A system exists to promote proper forest practices in Montana and protect water resources. This system could be enhanced by auditing forestry best management practices on a broader spectrum of timber harvest sites.

Audit Findings

The term forest practices generally refer to activities related to timber harvest. Montana's current forest practices regulatory framework consists of both mandatory requirements and voluntary applications. The majority of on-the-ground forest practices activities, such as road design and building, timber harvest operations, and stream crossings are administered using voluntary forestry best management practices (BMPs). In response to a 1987 amendment to the federal Clean Water Act, voluntary BMPs were developed in Montana as a primary tool to protect water resources from non-point sources of pollution during forest practices activities.

Audit work found Montana's system to promote proper forest practices consists of three main components. These include:

- ▶ Partnerships and education to enhance implementation of sound forest practices.
- ▶ On-site inspections of forest practices activities and landowner consultations to improve compliance with BMPs.
- ▶ Biennial BMP audits which are an essential component for the Department of Natural Resources and Conservation (DNRC) to evaluate if forest practices were conducted responsibly.

We compared Montana's track record for protecting forest water resources to states with higher levels of statutory requirements related to forest practices. Our review found Montana's process, which relies heavily on voluntary BMPs, appears to achieve similar results in protecting water resources as states with a more regulation-oriented structure. Using BMPs to protect water resources has become part of the culture of conducting forest practices in Montana.

DNRC uses site selection criteria to randomly select 40 to 45 "high-risk" timber harvest sites for biennial BMP audits. To be considered high-risk, any portion of a timber sale must be located within 200 feet of a stream or other water source. The current selection criteria limits other high-risk sites from being considered for a BMP audit. In one example, a road constructed for a timber sale had over 100 stream crossings but the timber harvest did not qualify to be selected because the actual harvest site was not within 200 feet of water. Audit documentation demonstrated road surface drainage, culvert installation, and other stream crossings have the highest departures from BMPs and are the highest potential sources of non-point water pollution. The current BMP audit selection criteria of focusing on timber harvests conducted near water have been used since 1989. While an important component of the process, it does not consider several other high-risk factors such as road construction, topography, soil type, logging method, etc. Timber industry representatives indicated different selection criteria should be used to provide a broader perspective of forest practices activities - not just those where a harvest was conducted within 200 feet of a water source.

Audit Recommendations

DNRC, in conjunction with the BMP Technical Working Group, should expand BMP audit selection criteria prior to the 2008 BMP audit cycle to audit/monitor a broader spectrum of timber harvest sites.